

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)	
)	Chapter 7
OLIVER AND OLIVIA)	
CHILDREN APPAREL, INC.)	Case No. 21-10572-SAH
)	
Debtor.)	

**MOTION TO EXTEND TIME FOR FILING COMPLAINT TO DETERMINE
DISCHARGEABILITY OF A DEBT AND BRIEF IN SUPPORT**

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to sustain the objection, or you wish to have your views considered, you must file a written response to the objection with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of the objection. You should also serve a file-stamped copy of the response to the undersigned [and others who are required to be served] and file a certificate of service with the court. If no response is timely filed, the court may sustain the objection and strike the scheduled hearing without further notice.

Chasity Frazier, Cheyenne Davis, Crystal Haney, Hunter Paige, Leah Vaughn, Mayra Ramirez, Melissa Coy, Selene Castro, Shawna Jones, Tracy Snyder, Vanessa Perez, and Shanna Cater (“Movants”) hereby ask this Court, pursuant to Fed. R. Bankr. P. 4007(c), to extend the time for them to file a complaint to determine the dischargeability of debts owed by Jill Ford pursuant to 11 U.S.C. § 523. In support of this request for relief, Movants state:

1. Debtors Jill and Trent Ford and Oliver and Olivia Children Apparel, Inc. (“OOCA”) filed for Chapter 7 bankruptcy on March 17, 2021.
2. Debtor Jill Ford owns OOCA.
3. Movants were employed by Debtor Ford at OOCA prior to the bankruptcy filing.

4. On or about Jan. 1, 2021, Movant Haney's OOCA-sponsored health insurance was canceled without notice to and unbeknownst to her. However, Debtors continued to deduct health insurance premiums from Movant Haney's paychecks.
5. On or about March 3, 2021, Debtors began failing to pay Movants' scheduled paychecks. Debtors failed to pay Movants for paychecks due on March 3, 2021, March 10, 2021, and March 17, 2021.
6. Prior to filing bankruptcy, one or both Debtors incorporated the Printed Tees Shirt Company on or around Feb. 25, 2021. Certain equipment leases held by OOCA were transferred to Printed Tees. Further, Debtor Jill Ford's relatives incorporated Buffalo Shirt Company on or around March 29, 2021. Buffalo Shirt Company will reportedly use the equipment transferred to Printed Tees by OOCA. Both businesses will provide merchandise similar to OOCA.
7. Citizens Bank of Edmond, MidFirst Bank, and the U.S. Trustee's Office have filed motions for extensions and 2004 examinations.
8. The current nondischargeability deadline is June 14, 2021. Movants respectfully request additional time to properly analyze the facts, evidence, and law to determine whether a nondischargeability claim may be brought against Debtors Jill and Trent Ford under 11 U.S.C. § 523(a)(2). Further, additional facts may be discovered during the 2004 examinations.
9. Pursuant to Fed. R. Bankr. P. 4004(a), complaints objecting to discharge and/or the dischargeability of certain debt "shall be filed no later than 60 days after the first date set for the meeting of creditors under § 341(a)."

10. Fed. R. Bankr. P. 4004(b)(1) further provides the Court “may for cause extend the time to object to discharge.”
11. Movants believe good cause exists to extend the Section 523(a) nondischargeability deadline.
12. Accordingly, Movants respectfully request the deadline to object to Debtors’ discharge or the dischargeability of certain debt be extended for 60 days, or until Aug. 14, 2021.

WHEREFORE, for the reasons set forth above, Movants respectfully request the Court enter an Order extending the deadline for Movants to object to the Debtors’ discharge and/or dischargeability of certain debts owed to Movants by 60 days, or until Aug. 13, 2021, and for all other relief this Court deems just and equitable.

Respectfully submitted,

/s/ Conner L. Helms

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of June, 2021, I electronically transmitted the above and foregoing Motion to Extend Time for Filing Complaint to Determine Dischargeability of a Debt and Brief in Support to the Clerk of the Court using the ECF System for filing and for transmitting a Notice of Electronic Filing to the ECF Registered Participants in the above-captioned proceeding.

/s/ Conner L. Helms

Conner L. Helms